

EPA COMMENT NUMBER: 550-3

Received: November 16, 1998

November 12, 1998

To: Presidents' Council on Food Safety

From: Sue Roberts, MS,RD,LD
Sue Roberts Health Concepts, Inc.
1515 Linden, Suite 220
Des Moines, IA 50309

Re: Food Safety Initiative Strategic Plan and NAS Report

Docket Number: OPP-00550A

Introduction:

Thank you for the opportunity to comment on the Food Safety Initiative Strategic Plan and the NAS Report. I am commenting as a consumer (mother of four, grandmother of four) and as a food and nutrition professional. I am a Registered Dietitian with a degree in food and nutrition from Iowa State University and a graduate degree in Preventive Medicine and Environmental Health from the University of Iowa, College of Medicine. I have worked as a Research Nutritionist in a NIH Clinical Research Center, as Director of Public Health for the State of Iowa, and currently have my own business, Sue Roberts Health Concepts, where our mission is empowering and supporting individuals in their health journeys by advocating lifestyles based on a holistic view of health and nourishment which integrate research, culture, and environmental sustainability into everyday practice. I will address each question as they appear in the Federal Register.

1. Question: Does the vision statement accurately depict an achievable food safety system vision? What modifications, if any, would you make?

Comments:

In general, the vision depicts an achievable food safety vision. I would encourage, however, the following additions:

a. The NAS report has a mission statement that includes protection and improvement of public health. I encourage this more encompassing outlook in the vision statement. In addition, I believe 'safe' should have a very broad definition to include not only free of pathogens, toxic chemicals or physical hazards, but to include issues as addressed by the NAS report such as naturally occurring toxins, allergens, intentional and unintentional additives, modified food components, agricultural chemicals,

environmental contaminants, animal drug residues, and excessive consumption of some dietary supplements.

b. I also believe food should support environmental sustainability and this should be stated in the first statement. We must begin a dialogue and action on environmental sustainability. This strategic plan is an opportunity to begin looking at these issues. We must begin addressing the fact that our current food system uses many natural resources.

c. The second statement "We work within a seamless food system that uses farm-to-table preventive strategies and integrated research, surveillance, inspection, and enforcement" should include education. It must be part of the farm-to-table preventive strategies. In addition, I believe the real focus should be on preventive strategies. Food should be treated with respect so as not to be contaminated versus accepting contamination as normal and then needing to develop technology for methods of decontamination.

d. The third statement should acknowledge vigilance towards threats technology itself may cause (deemed helpful by some, harmful by others such as irradiation). The government must practice this vigilance always.

e. It is important there is full disclosure of every process a food has gone through (ie: irradiation, biogenetic engineering). The fifth statement could include this by reading "Food is safe because everyone has complete information, understands, and accepts their responsibilities.

2. Question: What are the barriers to pursuing this vision? What gaps currently exist in the food safety system that impede achievement of this vision?

Comments:

a. One barrier is inconsistent and outdated statutory mandates which sometimes limit implementation of scientific practices.

b. Another barrier is multiple agencies with varying food safety programs causing:

- * food safety problems to fall through cracks when no agency has jurisdiction
- * glaring public health problems no addressed
- * food processing plant inspections inconsistent with some getting 2 inspections (ie: pepperoni & cheese frozen pizza) to others getting almost no inspection (ie: FDA's inability to get to all the plants in timely manner)
- * HACCP systems implemented differently at FDA & USDA
- * Inconsistent and inadequate handling of imported food

c. A third barrier is inconsistent inspection, regulation, and education of the food service industry, from nonuse of FDA national standards to underfunding for activities. This is especially important as more meals are eaten away from home.

d. A fourth barrier is no single voice representing food safety issues.

3. Question: To make the vision a reality, what changes are needed for: (a) government agencies at the Federal, State, and local level; (b) industry; (c) public health professionals; (d) consumers; and (e) others?

Comments:

a. Government agencies at the federal, state and local level

- * A comprehensive federal food safety program with common leadership, mandate, and resources.

- * Uniform and effective programs for all food from farm to table. For example:

- * single set of science-based inspection regulations for all foods

- * uniform & effective import inspection

- * food safety programs equal or greater than U.S. program from importing countries

- * uniform and effective HACCP programs in all food plants and foodservice establishments

- * use of inspection forces where most needed

- * uniform use of FDA Food Code Safety standards for foodservice industry

- * Complete coordination and standardization of inspections between federal, state and local agencies (forms, computer access, etc.)

- * Rapid consumer notification of hazards in the food supply

- * Constant research and vigilance in safety of all aspects of food supply (ie: food additives, biogenetic engineering, antibiotics and hormones in food supply)

b. Industry

- * Registration of food plants

- * Utilization of HACCP and appropriate technologies in food processing

- * Utilization of HACCP and appropriate technologies in the foodservice industry

c. Consumers

- * Continual, effective, education leading to safe food handling techniques

- * Continual, effective, education leading to understanding of subsequent purchasing of wholesome, minimally adulterated foods

4. Question: What should be short-term goals and critical steps to realize this vision? What should be the long-term goals and steps?

Comments:

Short term goals should be those listed in number 3 above. The food safety systems should be designed in short term to transition well into a single food safety agency.

Long term goals should be directed toward development of comprehensive food safety legislation including monitoring surveillance, inspection, enforcement, outbreak management, research and education as it relates to the entire food system. In addition, long term goals should be directed toward the establishment of a single food safety agency.

5. Question: What is the best way to involve the public in development of a long-term food safety strategic plan? What additional steps besides public meetings would be beneficial?

Comments:

One method of involving the public would be to develop a consumer committee with an advisory role to the Presidents' Council. In addition, use of dialogue meetings with consumers and consumer representative groups could provide needed public input. There should also be a method for peer review of the strategic plan.

6. Question: What are your comments on the conclusions and recommendations of the NAS report "Ensuring Safe Food from Production to Consumption"?

Comments:

I agree with the conclusions and recommendations of the NAS report. The Presidents' Council of Food Safety should work toward implementing the recommendations in a timely manner and work toward a unified food safety program.

Conclusion:

As Americans, we rely on our government to guarantee safe food (nutritious while free of pathogens, free of unhealthy chemicals such as animal drug residues, or free of physical hazards). I truly believe this is not being done very effectively now (as documented in the NAS report). In addition, in many ways, the American food system shows signs of running amuck from excessive processing of wholesome foods. I believe the Presidents' Council must strategically plan for national food safety in an all encompassing manner addressing issues not just of microbiological pathogens, but issues such as nutritional quality, biogenetic engineering, education, modified food components, animal drug residues, intentional and unintentional food additives and environmental sustainability.

The NAS report is a very good report. They acknowledge they did not look at all issues. This needs to be done by the Presidents' Council of Food Safety as they develop the strategic plan for a national food safety program. However, the recommendations of the report should be implemented in a timely fashion. A new national food safety program (both legislation and administration) is needed in the United States. My hope is that government agencies and legislatures can work cooperatively to achieve this. This is not the time for turf battles at the expense of American citizens. This dialogue must continue and action taken.